

Alice Kelly, Northwest Regional Office, Department of Ecology
Randel Perry, U.S. Army Corps of Engineers, Regulatory Branch
Tyler Schroeder, Planning and Development Services, Whatcom County

January 22, 2013

Re: Proposed Gateway Pacific Terminal EIS Scoping

Dear Ms. Kelly, Mr. Perry, and Mr. Schroeder:

The San Juan County Salmon Technical Advisory Group is responsible for implementing the San Juan Chapter of the federally approved Puget Sound Chinook Salmon Recovery Plan. Protection of high quality habitat and prey resources for salmon is the primary goal of the local San Juan County Chapter of the Puget Sound Chinook Salmon Recovery Plan and thus why the Salmon Technical Advisory Group feels the need to comment on the proposed Gateway Pacific Terminal (GPT).

The GPT and associated mining, transportation, and burning of coal poses the risk of significant adverse impacts to salmon, salmon prey, and salmon habitat in the San Juan Islands. To address our concerns, we respectfully request that the co-lead agencies, in compliance with NEPA and SEPA, include in the Environmental Impact Statement (EIS), the topics and analyses identified below.

All potential impacts of GPT to salmon, salmon habitat, and salmon prey in San Juan County should be analyzed and evaluated, including impacts to water quality, air quality, critical habitat, aquatic resources, and endangered species as well as impacts to our environment and economy, including recreational, commercial and tribal fisheries.

Key Questions for this Proposal:

- What impacts could the terminal and other shipping impacts have on the genetically-distinct, spring-spawning Cherry Point herring stock and the associated food web, including federally listed Chinook salmon?
- What is the increased risk of collision and subsequent oil spills from over 900 additional large vessel transits through San Juan waters (Haro Strait, Boundary Strait, Rosario Strait)?
- What is the impact of oil spills on the local nursery in the San Juans for juvenile forage fish and salmon, including the ESA-listed Chinook salmon?
- San Juan County will be profoundly affected by global climate change, including sea level rise, ocean acidification, and changing weather patterns. What role will the additional burning of North American coal in Asia play in affecting the climate change impacts to the marine environment used by salmon and their prey?
- The best available science indicates that mining, transportation, and burning coal is a significant contributor to global climate change. The amount of CO₂ released into the atmosphere by burning the proposed 48 million tons coal / year from GPT approximately equals all the current CO₂ emissions, from all sources, in Washington State. How is GPT consistent with the Governor's Executive Order, dated 27 November 2012 that states, in part, "The most urgent action is to slow the pace of acidification by reducing the sources of ocean acidification. Global emissions are the largest source of carbon dioxide. The panel recommends Washington state

continue to press for reduced carbon dioxide emissions at home and provide leadership in regional, national and international forums for larger-scale efforts." ? ¹

In addition to these questions, the following topic areas of concern need to be addressed and analyses completed as part of the EIS to assess and evaluate these concerns.

Topic Areas Needing to be Addressed:

- Vessel traffic
 - Increased risk of oil spills and impact to marine environment, i.e. vegetation and wildlife including salmon and food web
 - Impact to marine environment from coal spills, i.e. vegetation and wildlife including salmon and food web
 - Decrease in water quality due to increased toxics in the environment including air emissions, coal dust, and oil spills
 - Impacts of discharged ballast water containing non-native, invasive species
 - Increased acoustic disturbances to marine life from increased vessel traffic
- Industrial site
 - Impacts of port infrastructure, oil spills, and non-point source pollution on the marine environment, especially Cherry Point herring stock
- Air pollution from burning of coal, diesel, and bunker fuel
 - Climate change impacts
- Ocean acidification from increased burning of coal and other fossil fuels
 - Impacts of increased ocean acidification on salmon and their prey (forage fish, amphipods, pteropods, copepods, etc.), including eggs and larval stages

Analyses Requested:

- Conduct risk analysis including possible volume and trajectories of oil spills, season, and geographic location, including proximity to local salmon and forage fish nurseries in the San Juans, and contingency plans for protecting sensitive areas and containing / cleaning up oil spills
- Conduct economic analyses of loss of commercial and recreational fisheries in the event of a major oil spill.
- Conduct environmental assessment of potential impacts in the Salish Sea.
 - Evaluate existing pre-spill strategies for resource protection and identify additional protection options for resources at risk.
 - Conduct chemical analysis of marine water quality including pH throughout San Juan County.
 - Establish baseline of all species present and current population size.
 - Conduct risk analysis and identify potential ecological impacts, including impacts to all listed species and associated food webs, from medium and large vessel fuel spills, coal dust, and vessel air emissions.
 - Identify potential impacts from all oil spill response techniques including dispersants.
 - Identify climate change impacts from mining, transportation, and burning of all coal attributed to GPT, including quantification of anticipated sea level rise and assessment of impacts from ocean acidification and ocean temperature increase.
- Analyze oil spill response capacity throughout the Salish Sea.

¹ Washington State Governor Christine Gregoire Executive Order: Washington's Response to Ocean Acidification (EO 12-07)

- Identify local resources available and resource gaps to respond to an oil spill within a 4-hour period.
- Provide plan for recovery and restoration following an oil spill.

Background and Significance of the San Juan Marine Ecosystem:

The entirety of San Juan County is a marine biological preserve established in the 1920s and codified in RCW 28B.20.320 to protect the unique and diverse community of marine plants and animals that live only here. The flora and fauna of this region are exceptionally rich and representative of nearly all major groups of marine algae and invertebrates. The shorelines of San Juan County are designated as Shorelines of Statewide Significance and critical habitat for federally listed threatened Chinook salmon and endangered Southern Resident killer whales. Increased shipping traffic and a major oil spill in this region could have significant impacts on these species.

In addition, the County's shorelines provide important outmigrating habitat for juvenile salmon, including Chinook, coho, pink and chum from multiple Puget Sound, Fraser River and Vancouver Island stocks. Local food webs support multiple species of ecological, cultural and economic importance in the region, such as Puget Sound Chinook, rockfish, the southern resident killer whale, and seabirds such as the marbled murrelet. This complexity and extent of marine shoreline, as well as the regional food web support they provide is unique. Potential impacts to this ecosystem must be thoroughly analyzed and evaluated in the Gateway Pacific Terminal area-wide Environmental Impact Statement.

The San Juan Archipelago is characterized by swift tidal currents and complex geography and geology, with over 400 miles of marine shorelines across hundreds of large and small islands. While predominantly rocky, the county's shorelines also support significant "soft" geomorphic shoreforms, including 90 miles of net shore drift cell systems (feeder bluffs, transport zones and accretion beaches), 48 miles of pocket beaches and nearly 20 miles of embayment estuaries and lagoons. The oiling residence time map for San Juan County, based on data from the Washington Department of Natural Resources Shore Zone Mapping (2001) illustrates the immense challenges our complex geography poses to oil spill prevention and recovery efforts, with over half of our shorelines (215 miles) designated as high residence time shorelines.

As detailed in the Puget Sound Partnership's Action Agenda and the Marine Stewardship Plan for San Juan County, major oil spills are ranked as the top threat to marine ecosystems and major oil spill prevention is identified as a top priority. As this project would significantly increase vessel traffic and thus the probability of a major spill, it is in direct conflict with our local and regional management plans based on state and federal regulations.

Since 2001, over \$6.8 million of federal and state funding has been spent on salmon recovery projects in San Juan County with an additional \$3.5 million provided via local, nonprofit, foundation and in-kind funding. The support of over \$10.3 million in local projects demonstrate the level of concern for salmon and marine resources in this relatively small community. The issues of the GPT as noted in this letter put all of this salmon recovery work at risk.

The San Juan County Salmon Technical Advisory Group requests that the scope of the Environmental Impact Statement include all significant adverse impacts of the GPT project from the mining, transportation, and combustion of coal, as well as the port at Cherry Point, Washington. We ask that the Environmental Impact Statement fully and completely include the connected and cumulative actions, issues and concerns of the marine ecosystem of San Juan County, as previously noted.

Thank you for your consideration.

Sincerely,

/Signed/

Kimbal A. Sundberg
on behalf of the San Juan County Salmon Recovery Technical Advisory Group

The San Juan Salmon Technical Advisory Group is comprised of:
Alan Chapman – ESA Coordinator, Lummi Natural Resources
Ray Glaze – Senior Developer, Northwest Marine Technology
Gene Helfman - Emeritus Professor, Odum School of Ecology, University of Georgia
Judy Meyer - Professor Emeritus, Odum School of Ecology, University of Georgia
Robert J. Naiman - Professor and UNESCO Chair in Sustainable Rivers School of Aquatic & Fishery Sciences, University of Washington
Kit Rawson - Senior Fishery Management Biologist, Tulalip Tribes
Chuck Schietinger – Physics / Chemistry Teacher, Spring Street School
Kimbal Sundberg - Habitat Biologist, Alaska Department of Fish and Game (retired)
Bob Warinner – Watershed Steward, Washington Department of Fish & Wildlife
Todd Zackey – Fisheries Biologist, Tulalip Tribes

Cc: Barbara Rosenkotter, San Juan County Lead Entity Coordinator for Salmon Recovery
San Juan County Marine Resources Committee